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14 *Attorneys for Defendant*  
15 *Walmart Inc.*

16 **UNITED STATES DISTRICT COURT**

17 **DISTRICT OF NEVADA**

18 JESSICA LIS, Plaintiff,  
19 vs.  
20 WALMAR INC. and DOES I through X,  
21 inclusive,  
22 Defendant(s).

23 Case No.: 2:20-cv-01324-JCM -EJY

24 **STIPULATION AND [PROPOSED]**  
**ORDER TO EXTEND DISCOVERY**  
**DEADLINES**  
**[SECOND REQUEST]**

25 Plaintiff JESSICA LIS (hereinafter “Plaintiff”) and Defendant WALMART INC. (hereinafter  
26 “Defendant” or “Walmart”), by and through their respective counsel of record, do hereby stipulate to  
27 extend the remaining deadlines in the current scheduling order and discovery plan in this matter for a  
28 period of sixty (60) days for the reasons explained herein.

29 Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the second such discovery  
30 extension requested in this matter.

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## **DISCOVERY COMPLETED TO DATE**

- The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures;
- The parties have filed all required documents pursuant to ECF 2 to date;
- Plaintiff has provided provider specific authorizations;
- Defendant has served written discovery to Plaintiff and Plaintiff has submitted timely responses;
- Plaintiff has served upon Defendant written discovery and Defendant has submitted timely responses;

**DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY**

Discovery to be completed includes:

- Deposition of Plaintiff;
- Depositions of Plaintiff's treating physicians;
- Depositions of fact witnesses;
- Disclosure of experts by both parties;
- Depositions of expert witnesses and rebuttal expert witnesses; and
- Plaintiff to notice Defendant's 30(b)(6) deposition.

The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested extension.

The parties agree that, pending this Court's approval, extension of remaining discovery deadlines is appropriate, as there is a slight delay in obtaining Plaintiff's complete medical records. Defendant subpoenaed applicable medical records regarding Plaintiff's treatment pre and post incident. These medical records are required in order to retain an expert and to provide a complete report so the matter is decided on the merits. Accordingly, the parties have agreed to a 60-day discovery extension in order to ensure that Defendant obtain the Plaintiff's applicable medical records prior to expert disclosures.

The parties have acted in good faith to request this extension and have no intent, nor reason, to delay the resolution of this matter.

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1                   **[PROPOSED] NEW DISCOVERY DEADLINES**

2                   **Expert Disclosure Deadline:**

3                   Currently: January 1, 2021

4                   Proposed: **March 2, 2021**

5                   **Rebuttal Expert Disclosure Deadline:**

6                   Currently: January 30, 2021

7                   Proposed: **March 31, 2021**

8                   **Discovery Cut-Off Date:**

9                   Currently: March 1, 2021

10                   Proposed: **April 30, 2021**

11                   **Dispositive Motion Deadline:**

12                   Currently: March 30, 2021

13                   Proposed: **May 28, 2021**

14                   **Proposed Joint Pre-Trial Deadline:**

15                   Currently: April 27, 2021

16                   Proposed: **June 25, 2021**

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1       If this extension is granted, all anticipated additional discovery should be concluded within the  
2 stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is  
3 made by the parties in good faith and not for the purpose of delay.  
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5 DATED this 3<sup>rd</sup> day of December, 2020.

6 **TINGEY & TINGEY**

7       */s/Justin L. Dewey*

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13      Las Vegas, NV 89102

14      *Attorneys for Plaintiff*  
15      *Jessica Lis*

5 DATED this 3rd day of December, 2020.

6 **PHILLIPS, SPALLAS & ANGSTADT LLC**

7       */s/ Latisha Robinson*

8       ROBERT K. PHILLIPS, ESQ.  
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16      *Attorneys for Defendant*  
17      *Walmart Inc.*

16      **IT IS SO ORDERED:**

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18      **UNITED STATES MAGISTRATE JUDGE**

19      **DATED:** December 3, 2020

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